

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of,)

Implementation of the Local Competition,)
Provisions in the Telecommunications Act)
of 1996)
_____)

CC Docket No. 96-98

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MAY 16 1996

**Comments of Lucent Technologies Inc.
in Response to
Notice of Proposed Rulemaking**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF GENERAL COUNSEL

Lucent Technologies Inc. ("Lucent") submits these comments in response to the Commission's Notice of Proposed Rulemaking in CC Docket 96-98, released April 19, 1996 (hereinafter the "NPRM").

Lucent -- formed as a result of AT&T's divestiture of its systems and equipment businesses* -- is a leading global manufacturer of telecommunications systems, equipment, software and related services with the predominant share of its revenues coming from sales to telecommunications infrastructure providers in the United States and abroad. Approximately 82% of Lucent's 125,000 employees are located in the United States, although the

* Lucent has recently gone through an initial public offering under which 17.6% of its stock is now publicly traded. The balance of its stock is held by AT&T which has announced its intention to distribute all such shares to AT&T stockholders by the end of 1996.

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Company has offices or distributors in more than 90 countries and territories around the world. Lucent designs, builds and delivers a wide range of public and private networks, communications systems and software, consumer and business telephone systems and microelectronics components. Bell Laboratories, the research and development arm for the company, is widely regarded as one of the world's foremost technology research and development organizations. Bell Labs has received an average of one patent a day since its inception in 1925, is home to seven Nobel Prize winners, and has won seven United States National Medals of Science and five United States National Medals of Technology. Bell Labs' scientific contributions include the transistor, the laser, the solar cell, the communications satellite, cellular telephony, and electronic switching.

As a vendor of communications systems and equipment, Lucent is intensely interested in the Commission's implementation of the Telecommunications Act of 1996 which will shape the industry for years to come. Lucent strongly supports the "pro-competitive, de-regulatory national policy framework" the Act and the Commission envision for the United States telecommunications industry (NPRM para. 1). Lucent's future business prospects in the United States and abroad, as well as the interests of Lucent's customers and employees, will be best served by policies

which stimulate the growth of the United States telecommunications industry. Such a pro-competitive framework will encourage the industry to introduce new technologies, new capabilities, and new choices to the marketplace in shorter timeframes. This approach helps ensure that the United States telecommunications industry continues to remain second to none and that end users receive services unparalleled in any other marketplace.

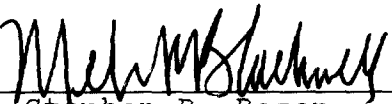
Lucent also supports the Commission's view recommending national policies which will minimize unnecessary local variation and exception for product requirements (NPRM para. 50). Such an approach will assure that the industry's development resources are used most efficiently, to the benefit of equipment purchasers and their customers as well as vendors. In addition, the presence of a reasonably uniform United States market will increase the probability that United States developed standards will influence standards worldwide, and thus assist all United States vendors in their sales of products and services to other markets.

Lucent intends to follow this important proceeding with interest and stands prepared to deliver quality solution in the form of products and services to meet the needs of all of its

customers under whatever set of rules the Commission ultimately adopts.

Respectfully submitted,

LUCENT TECHNOLOGIES INC.

By 
for Stephen R. Rosen
Theodore M. Weitz

Its Attorneys

475 South Street
Morristown, New Jersey 07962-1976

Dated: May 16, 1996

Certificate of Service

I, Allen Kratz, do hereby certify that on this sixteenth day of May, 1996, a copy of the foregoing "Comments of Lucent Technologies Inc. in Response to Notice of Proposed Rulemaking" in CC Docket No. 96-98 was personally served on the parties listed on the attached service list.

A handwritten signature in black ink, appearing to read "Allen Kratz", with a long, sweeping horizontal stroke extending to the right.

Allen Kratz
Lucent Technologies Inc.

May 16, 1996

Service List, CC 96-98

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, DC 20554

Regina Keeney, Chief
Common Carrier Bureau
Federal Communications Commission
1919 M Street, Room 500
Washington, DC 20554

International Transcription Service
1919 M Street, Room 246
Washington, DC 20554

Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, Room 814
Washington, DC 20554

James H. Quello, Commissioner
Federal Communications Commission
1919 M Street, Room 802
Washington, DC 20554

Rachelle B. Chong, Commissioner
Federal Communications Commission
1919 M Street, Room 844
Washington, DC 20554

Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, Room 832
Washington, DC 20554